

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

VIOLETTE GAIL ELDRIDGE
a/k/a GAIL VIOLETTE ELDRIDGE,
MELVIN RAY LYTTLE,
PAUL E. KNIGHT, and
JOHN L. MONTANA, JR.,

AFFIDAVIT
05-CR-6116-CJS

Defendants.

GAIL ELDRIDGE, being duly sworn, deposes and says that:

1. I am one of the defendants in the above-referenced matter.
2. I execute this affidavit in support of the omnibus motions filed on my behalf.
3. I have resided at 1123 Washington Avenue in Woodstock, Georgia since 1994. During the time of the allegations of the Indictment, namely from the Summer of 1999 to July 2001, I resided in Woodstock, Georgia.
4. My address was known to the Government and was used on my income tax returns.
5. I have had no contact with the Western District of New York or Rochester New York until the time I was charged in the Fall of 2006 in this case.
6. I have never spoken to Doug Sample who apparently resides in the Western District of New York. I did not know of any contacts that the co-defendants may have had with Mr. Sample as alleged in the Indictment.
7. The return of funds alleged in the Indictment for Mr. Sample occurred without my knowledge.
8. The continued prosecution of this case in the Western District of New York is extremely burdensome and inconvenient to me.
9. I have no relatives or friends residing in the Western District of New York.
10. The overwhelming majority of the alleged events in the Indictment did not involve the Western District of New York. The UTA-BVI had offices in Manhattan, which is not a part of the Western District of New York. I reside in Woodstock, Georgia.
11. I have been appointed legal counsel due to my financial indigency. The costs of food, transportation, and cost of staying in a hotel for pre-trial hearings, and eventually trial for a number of weeks is cost prohibitive. I am not able to meet with my attorney as

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frequently as I would like due to cost associated with traveling from Georgia to Rochester.

12. The continued prosecution of this case in the Western District of New York is inconvenient and not the most appropriate forum.

WHEREFORE, your deponent respectfully requests that the relief requested in the Omnibus Motion be granted in its entirety, that the Indictment be dismissed, or in the alternative, for a change of venue to a more convenient forum.

/s/ Gail Eldridge
GAIL ELDRIDGE

Sworn to before me this 4th day of
January, 2007.

/s/ Charlene M. Ahern
NOTARY PUBLIC

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